



INSPECTION REPORT

Commonwealth of Pennsylvania
Department of Environmental Protection
Air Quality Program

Date(s) of Inspection:

4-14-04

Permit #(s):

36-3033

AIRS CDS# (For Permitted Sources):

Company Name: BULOVA

TECHNOLOGIES, LLC

Municipality:

LANCASTER CITY

County:

LANCASTER

Plant Name:

LANCASTER

Physical Location:

101 N. QUEEN ST.
LANCASTER, PA

Federal ID — Plant Code #:

Responsible Official:

MR. RICK DANIELS

Mailing Address:

P.O. BOX 4787

Title:

MANAGER MAINTENANCE

LANCASTER, PA 17604

Phone #(s):

(717) 299-2581

Mark (X) All Inspection Types That Apply To This Inspection:

Announced	<input checked="" type="checkbox"/> Level 2 Inspection (L2)	File Review (FR)
Operating Permit Inspection (PI)	Multi-Media Inspection (MM)	Complaint Inspection (CI)
Observation/Partial Inspection (OB)	Follow-Up Inspection (Ref. Date: _____)	Sample Collection (SC)
Other:		

For Level 2 Inspections, Mark (X) All Activities That Apply:

<input checked="" type="checkbox"/> File Review - Pre-Inspection	<input checked="" type="checkbox"/> Pre-Inspection Briefing	<input checked="" type="checkbox"/> Verify Production Rates
<input checked="" type="checkbox"/> Compliance Assurance Monitoring Review	<input checked="" type="checkbox"/> Check All Significant Sources	<input checked="" type="checkbox"/> Verify Operation of Control Devices
<input checked="" type="checkbox"/> Pre-Inspection Observations	<input checked="" type="checkbox"/> Check For New/Unreported Sources	<input checked="" type="checkbox"/> Verify Operation of CEMS
<input checked="" type="checkbox"/> Visible Emissions Observations	<input checked="" type="checkbox"/> Operation & Maintenance Records/Logs	<input checked="" type="checkbox"/> Sample(s) Collected
Other:		<input checked="" type="checkbox"/> Exit Interview/Briefing

Comments:

THERE WERE NO AIR QUALITY
VIOLATIONS OR PROBLEMS OBSERVED DURING
THE INSPECTION.

THE ETHYLENE OXIDE STERILIZATION
UNIT WAS NEVER INSTALLED.

Compliance Status: ☒ In ☐ Out ☐ Pending ☐ Awaiting Co. ReportNeeds a Follow-Up Inspection? ☐ Yes ☒ No

Company Representative:

RICK DANIELS

Title: MANAGER

MAINTENANCE

Signature:

Rick Daniels

Date:

4-14-04

DEP Representative:

T.L. RAINAR

Title:

AQS

Signature:

T.L. Rainar

Date/Time:

4-14-04

This document is official notification that a representative of the Department of Environmental Protection, Air Quality Program, inspected the identified site. The findings of this inspection are shown above and on any attached pages, and may include violations uncovered during the inspection. Violations may also be discovered upon review of sample results or from any additional review of Department records. Notification will be forthcoming, if such violations are noted.

DMP 5/12/04

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
AIR QUALITY PROGRAM
CHAPTER 127 INSPECTION REPORT

PERMIT NO: 36-3033
DATE PREPARED: 5-12-04
BY: T. L. Rainar *TLR*
E-FACTS I.D.: 1328570

1. OWNER OF SOURCE
Bulova Technologies, L.L.C.

2. LOCATION OF SOURCE
Site: 101 N. Queen St.
Munic.: Lancaster City
County: Lancaster

3. SOURCE & AIR CLEANING DEVICE
Source: Plating and Finishing
Area
A/C Device: Heil Packed Tower
Scrubber

4. OFFICIAL (CONTACTED):
Name: Mr. Robin E. Thomas
Title: Director Environmental
Compliance
Name: Mr. Rick Daniels
Title: Manager Maintenance

(MAIL TO): Mr. Robin E. Thomas
Title: Director Environmental
Compliance
Address: P. O. Box 4787
City, State: Lancaster, PA 17604-4787

5. WAS EQUIPMENT OPERATIONAL ? Yes WAS INSPECTION ANNOUNCED? No

6. PRODUCTION/FIRING RATE: Average production in all Departments

7. MAXIMUM PRODUCTION/FIRING RATE INFORMATION: Same

8. OPERATING PARAMETERS: Water flow to scrubber:
pH: (see remarks)
Valve on pump:
Line pressure: psi
Caustic solution: NaOH

9. AVERAGE STACK OPACITY: 0 % MALODORS: None FUGITIVE: None

10. APPLICATION CONFORMANCE: N/A STANDARDS COMPLIANCE: See Remarks

11. MALFUNCTIONS SINCE LAST INSPECTION (If yes, explain in remarks) None

12. REMARKS: The scrubber did control three areas each with numerous pick-up points. The three areas are the Chem Lab, the Finishing/Plating area and the Technical Products area. The majority of the pick-up points are for plating operations which include nickel, chromate, copper, and zinc lines. A small amount of precious metal plating is conducted in the Lab.

RECOMMENDATIONS *DMS*

Issue Operating Permit
Reissue Operating Permit
Issue Temporary Permit
Reissue Temporary Permit
Deny Operating Permit
X Reinspection Only
Other: See Remarks

DATE INSPECTED: 04/14/04
VALID UNTIL: See Remarks

REMARKS: (continued)

The SOP - NM Permit was issued on 5-23-01 with an effective date of 6-1-01.

The Detrex Conveyorized Degreaser covered by Operating Permit No. 36-327-011A was taken out of service in 1995.

An additional Soldering Operation was installed as part of Circuit Board Assembly Production in April 2001. This installation was granted a Minor Significance Determination on 2-2-01.

The following sources are listed on the Natural Minor application:

- 101 Metal Finishing Processes
- 102 Conformal Coating
- 103 Small Scale Cleaning
- 104 Soldering Operations
- 105 Lubricating Processes
- 106 Packaging/Stenciling/Etc.
- 107 Sealing/Gluing/Bonding
- 108 Potting/Encapsulation

All of the above sources previously exhausted to the Heil Packed Tower Scrubber. The Conformal Coating Operation is also equipped with Dry Panel Filters which in turn vented to the Scrubber.

During the 1-15-03 inspection the writer discovered that the Recirculating pump for the scrubber solution was not in operation. The induced draft fan was operating and there was adequate ventilation at all source pick-up points. After checking with Rick Daniels, Manager Maintenance, Mr. Thomas reported the following day that the Scrubber Pump had been de-activated on 12-7-02 due to a structural failure of the Mist Eliminator. Due to freezing temperatures this malfunction led to ice build-up on the fan and surrounding roof. Refer to letters from Mr. Thomas and Mr. Daniels for more information.

Mr. Thomas was advised that not operating the scrubber as designed constitutes a violation of Permit Condition B.7.(b). of the recently issued SOP - NM permit and therefore Section 127.444. He reported that since the original installation many of the operations have been outsourced and downsized and the scrubber may not be needed at all. The writer advised him to submit a Request for Permit Determination to Engineering Services.

REMARKS: (continued)

The company did submit the Request for Permit Determination on 2-20-03 to operate the sources without the scrubber. On 6-4-03 Engineering Services did grant the minor significance determination. Mr. Daniels did indicate that the scrubber was put back into operation around 3-1-03 when the freezing weather ended. They had planned to operate the unit until advised by the Department. The writer advised them that in view of the determinations by Engineering Services, they could decommission the scrubber. Mr. Daniels reported the unit would be taken out of service that day, 7-24-03. The ductwork and fan systems will continue to be operated as a general exhaust system. Refer to the information submitted by the company for further clarification.

During this inspection there were no visible, fugitive or malodorous emissions from any of the sources. As per instruction from Mr. Lenz, Bulova will submit a letter requesting that the Natural Minor Permit be withdrawn. It was decided that no enforcement action is appropriate for this violation.

The company did submit a letter dated 7-25-03 requesting that the SOP-NM Permit No. 36-03033 be withdrawn.

On 8-13-03, a Request for Permit Determination form was received for the planned installation of an Ethylene Oxide Sterilization System. The exemption was granted on 8-20-03. According to Mr. Daniels, the contract which would have necessitated this equipment did not materialize and the source was never installed.

Around 1-1-04, the Scrubber Fan was replaced with a 30,000 CFM General Exhaust Fan. The current configuration continues to utilize the old pick-up points and exhaust ductwork.

As per the company's request to withdraw the current Operating Permit, on 5-28-04 a "Permit Suspension" letter was sent to confirm that the NM Permit is no longer in effect.

cc: Southcentral Region